

Joki, Jennifer

From: MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
Sent: Thursday, January 14, 2016 4:53 PM
To: Robinson, Deborah
Cc: PARRETT Kevin
Subject: FW: EPA/DEQ 1/21 and 1/22 Break Out Session Agenda

Hi Debbie,

The following is a suggested agenda for the Thursday afternoon EPA/DEQ meeting on January 21 and the morning of January 22nd as needed. I included the DEQ FS comments on the riverbank below for reference. Note that we have not received the referenced riverbank flow chart to date from EPA.

- Definition of Sediment Recontamination
- Source Control Demonstration Stormwater Pathway
- Source Control Demonstration Groundwater Pathway
- Source Control Demonstration Riverbank Pathway RAO 9
 - EPA Riverbank Flow Chart
 - DEQ FS comments

2.2 Remedial Action Objectives, Ecological, RAO 9 – River Banks. EPA included RAO 9 to address potential migration of Contaminants of Concern (COCs) in riverbanks to sediment and surface water, and DEQ understands that EPA is developing a flow chart that outlines how EPA intends to utilize the RAO 9 preliminary remediation goals (PRGs) in the remedy selection process. We look forward to receiving this flow chart and discussing the riverbank remedy Portland Harbor Feasibility Study selection, remedial design and remedial construction process. We note that DEQ has and is continuing to characterize potentially erodible riverbank soil and screen results against Joint Source Control Strategy Screening Level Values (SLVs) and the current EPA PRGs to evaluate the need for riverbank source control measures. In most cases, DEQ is not characterizing or evaluating risk associated with riverbank sediment present below mean high water.

- During discussion of the riverbanks, EPA should clarify whether the term riverbank is limited to a geomorphic feature or also applies to beach above specified elevations?
- Is the portion of the riverbank below MHW (defined as sediment in the Final BERA, Attachment 2, Problem Formulation Figure 1) also subject to other RAOs such as RAO 5?
- Will the riverbank remedy selection, remedial design and remedial construction process sufficiently address the riparian zone as defined in the footnote on Figure 1 of the Final BERA Problem Formulation (bank area between MHWM and the OHWM)?

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